

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF TEXAS  
DALLAS DIVISION

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|                                |   |                   |
|--------------------------------|---|-------------------|
| UNITED STATES OF AMERICA       | § |                   |
|                                | § |                   |
| V.                             | § | NO. 3:15-CR-164-B |
|                                | § |                   |
| ELIZABETH UWAGBOI-UGBECHE (04) | § |                   |

**MOTION FOR PERMISSION TO TRAVEL**

TO THE HONORABLE JANE BOYLE, UNITED STATES DISTRICT JUDGE:

COMES NOW ELIZABETH UWAGBOI-UGBECHE, the Defendant in the above styled and numbered cause and files her motion seeking permission to travel outside of the Northern District of Texas and for cause would show the Court as follows:

**I.**

The Defendant was released by United States Magistrate Renee Toliver on conditions of release on May 8, 2015. The Defendant's travel is restricted to the Northern District of Texas as well as to Collin and Denton counties. While the Defendant has been on release with travel restricted to these specific counties, the Defendant has had no problems or issues complying with her conditions or her pre-trial services officer.

In July 2015, the Defendant requested permission to travel elsewhere in the state of Texas for two separate trips to Houston and El Paso. This permission was unopposed by her pre-trial services officer and the Government and the Court granted the motion permitting the Defendant to travel. See Doc. 48. The travel occurred without incident, and since that time the Defendant has continued to be fully compliant with all of her conditions of pre-trial release.

**II.**

While on conditions of release, the Defendant has continued her higher education while also continuing to work and is scheduled to graduate with a BSN in nursing from Grand Canyon University in April. The Defendant requests that the Court grant her permission to travel for the period of April 22<sup>nd</sup> to April 26<sup>th</sup> to Phoenix in order to attend her graduation ceremony. Undersigned Counsel has spoken with Officer Karen Collins, the pre-trial services officer supervising the Defendant, who has informed undersigned counsel that she does not oppose this request for travel. Undersigned counsel has also spoken to AUSA Doug Brasher, the prosecutor assigned to this case, who has informed undersigned counsel that the Government takes no position on this motion.

WHEREFORE, the Defendant prays that the Court grant the Defendant permission to travel on this brief trip as requested herein.

Respectfully submitted,

/s/ Paul T. Lund

PAUL T. LUND

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CERTIFICATE OF CONFERENCE

Prior to the filing of this motion the undersigned counsel for the Defendant conferred with AUSA Doug Brasher, about the merits of this motion. AUSA Brasher stated that the Government takes no position on the Defendant's motion.

/s/ Paul T. Lund

PAUL T. LUND

CERTIFICATE OF SERVICE

This is to certify that a true and correct copy of the foregoing motion was delivered by ECF filing to Doug Brasher, Esq., the Assistant United States Attorney in charge of this case on March 15, 2016.

/s/ Paul T. Lund

PAUL T. LUND